Sara,

As promised here is for your review a short write up for Jessica and others.

Thank you,

Viorica

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Hi Jessica,

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

55.2 Definitions/OCS source

OCS source means any equipment, activity, or facility which:"

OCS source means any equipment, activity, or facility which:

(1) Emits or has the potential to emit any air pollutant;

(2) Is regulated or authorized under the Outer Continental Shelf Lands Act ("OCSLA") ([**HYPERLINK "https://www.govinfo.gov/link/uscode/43/1331" \t "_blank"**] et seq.); and

(**3**) Is located on the OCS or in or on waters above the OCS.

Ex. 5 Deliberative Process (DP)

55.2 Definitions/OCS source

This definition shall include vessels only when they are:

(**1**) Permanently or temporarily attached to the seabed and erected thereon and used for the purpose of exploring, developing or producing resources therefrom, within the meaning of section 4(a)(1) of OCSLA ([**HYPERLINK "https://www.govinfo.gov/link/uscode/43/1331" \t "_blank"**] et seq.); or

(**2**) Physically attached to an *OCS facility*, in which case only the stationary sources aspects of the vessels will be regulated

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From Eric

Hi Viorica,

Ex. 5 Deliberative Process (DP)

Happy to chat if needed.

- Eric

From: Petriman, Viorica <[HYPERLINK "mailto:Petriman.Viorica@epa.gov"]>
Sent: Wednesday, February 16, 2022 4:24 PM
To: Wortman, Eric <[HYPERLINK "mailto:Wortman.Eric@epa.gov"]>
Subject: OCS source definition & WT without emissions

Hi Eric,

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

- **~40 kW portable diesel generators on the WTGs:** These generators will temporarily supply power to the WTGs during construction. During the cold commissioning of the WTGs, it is anticipated that there will be one ~40 kW generator on each WTG for 5 days, operating for 24 hours per day. These generators will be removed when cold commissioning is completed and the WTG is energized. If it is not possible to energize the WTG due to the lack of an electrical grid, three ~40 kW generators may be used on each WTG for hot commissioning. These three ~40 kW generators would operate for approximately 5 days, 24 hours per day. After hot commissioning is completed, one ~40 kW generator may be used on each WTG for up to 30 days at partial load (28 kW) until energization of the WTG is possible.

- **~800 kW temporary diesel generator(s) on the ESPs:** Similar to the generators above, a temporary ~800 kW diesel generator will temporarily supply power to the ESPs during installation, cable pulling, and commissioning. The temporary diesel generator will be on each conventional ESP (or set of co-located light-weight ESPs) for about 90 days, operating for approximately 25% of the time. If one 800 MW conventional ESP is used, only one generator is needed. The generator(s) may be removed when cold commissioning is completed and the ESP is energized or remain on the ESP to provide additional stand-by power during O&M. If the generator is removed after commissioning, the same ~800 kW generator may be used for both ESPs (or sets of co-located light-weight ESPs).

During operation, the WTGs themselves will not emit air pollutants. However, during the Project's operation, the ESPs will be equipped with diesel generators and the WTGs may be equipped with diesel generators (depending on the model of WTG selected). OCS sources during O&M may include:

- **~50 kW portable diesel generators on the WTGs during O&M:** Depending on the WTG model used for the Project, portable ~50 kW diesel generators may be used on each WTG. These generators would be temporarily placed on the WTGs to supply backup power to critical systems on the WTGs if the Project's offshore cable system fails, which is estimated for the purposes of this permit application to occur for no more than 0.2% of the year (~18 hours). The WTGs would only be considered OCS sources while the portable generators are located on the WTGs.

- **~6 kW diesel emergency generators on the WTGs during O&M:** Depending on the WTG model used for the Project, each WTG may contain a ~6 kW diesel emergency generator that would operate for no more than 100 hours per year during operations and maintenance. The purpose of this generator is to supply backup power to critical systems on the WTGs if the Project's offshore cable system fails. These emergency generators will only operate for emergencies and reliability testing.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

55.2 Definitions/OCS source

OCS source means any equipment, activity, or facility which:"

OCS source means any equipment, activity, or facility which:

(1) Emits or has the potential to emit any air pollutant;

(2) Is regulated or authorized under the Outer Continental Shelf Lands Act ("OCSLA") ([**HYPERLINK "https://www.govinfo.gov/link/uscode/43/1331" \t "_blank"]** *et seq.*); and

(3) Is located on the OCS or in or on waters above the OCS.

Ex. 5 Deliberative Process (DP)

55.2 Definitions/OCS source

This definition shall include vessels only when they are:

(1) Permanently or temporarily attached to the seabed and erected thereon and used for the purpose of exploring, developing or producing resources therefrom, within the meaning of section 4(a)(1) of OCSLA (**[HYPERLINK "https://www.govinfo.gov/link/uscode/43/1331" \t "_blank"]** *et seq.*); or

(2) Physically attached to an OCS facility, in which case only the stationary sources aspects of the vessels will be regulated

This definition shall include vessels only when they are:

(1) Permanently or temporarily attached to the seabed and erected thereon and used for the purpose of exploring, developing or producing resources therefrom, within the meaning of section 4(a)(1) of OCSLA (**[HYPERLINK "https://www.govinfo.gov/link/uscode/43/1331" \t "_blank"]** et seq.); or

(2) Physically attached to an OCS facility, in which case only the stationary sources aspects of the vessels will be regulated.

Ex. 5 Deliberative Process (DP)

(6)
(i) *Building, structure, facility, or installation* means all of the pollutant-emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control) except the activities of any vessel. Pollutant-emitting activities shall be considered as part of the same industrial grouping if they belong to the same "Major Group" (*i.e.,* which have the same first two digit code) as described in the *Standard Industrial Classification Manual, 1972,* as amended by the 1977 Supplement (U.S. Government Printing Office stock numbers 4101-0066 and 003-005-00716-0, respectively).

which meet the 3 OCS source criteria, and thus they make the facility an OCS source. In other words, a facility can be an OCS source if it meet can be an OCS source provided that all of criteria at 1 through 3 are met.

Ex. 5 Deliberative Process (DP)

Routinely, a facility (onshore) is a collection of many pieces of equipment and more than one activity.

A facility is more than one equipment, activity – a facility is a collection of more than one equipment and or activity;

A facility which meets the 3 criteria for an OCS source is an OCS source;

Ex. 5 Deliberative Process (DP)

OCS source means any equipment, activity, or facility which:

(1) Emits or has the potential to emit any air pollutant;

(2) Is regulated or authorized under the Outer Continental Shelf Lands Act ("OCSLA") ([**HYPERLINK "https://www.govinfo.gov/link/uscode/43/1331" \t "_blank"]** et seq.); and

(3) Is located on the OCS or in or on waters above the OCS.

In (2) below, OCS facility means a facility that was already determined that is an OCS source

This definition shall include vessels only when they are:

(1) Permanently or temporarily attached to the seabed and erected thereon and used for the purpose of exploring, developing or producing resources therefrom, within the meaning of section 4(a)(1) of OCSLA (**[HYPERLINK "https://www.govinfo.gov/link/uscode/43/1331" \t "_blank"]** et seq.); or

(2) Physically attached to an OCS facility, in which case only the stationary sources aspects of the vessels will be regulated.

52.21

Stationary source means any building, structure, facility, or installation which emits or may emit a regulated NSR pollutant.

(6)

(i) *Building, structure, facility, or installation* means all of the pollutant-emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control) except the activities of any vessel. Pollutant-emitting activities shall be considered as part of the same industrial grouping if they belong to the same "Major Group" (*i.e.,* which have the same first two digit code) as described in the *Standard Industrial Classification Manual, 1972,* as amended by the 1977 Supplement (U.S. Government Printing Office stock numbers 4101-0066 and 003-005-00716-0, respectively).

(ii) Notwithstanding the provisions of **[HYPERLINK "https://www.ecfr.gov/current/title-40/section-52.21" \l "p-52.21(b)(6)(i)"]** of this section, *building, structure, facility, or installation* means, for onshore activities under Standard Industrial Classification (SIC) Major Group 13: Oil and Gas Extraction, all of the pollutant-emitting activities included in Major Group 13 that are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control). Pollutant emitting activities shall be considered adjacent if they are located on the same surface site; or if they are located on surface sites that are located within 1/4 mile of one another (measured from the center of the equipment on the surface site) and they share equipment. Shared equipment includes, but is not limited to, produced fluids storage tanks, phase separators, natural gas dehydrators or emissions control devices. Surface site, as used in this **[HYPERLINK "https://www.ecfr.gov/current/title-40/section-52.21" \l "p-52.21(b)(6)(ii)"]**, has the same meaning as in **[HYPERLINK "https://www.ecfr.gov/current/title-40/section-63.761"]**.

Part 70

Stationary source -- means any building, structure, facility, or installation that emits or may emit any regulated air pollutant, or any pollutant listed under section 112(b) of the Act.

Sub 8

"Facility" means the combination of all structures, buildings, equipment, control apparatus, storage tanks, source operations, and other operations that are located on a single site or on contiguous or adjacent sites and that are under common control of the same person or persons.

Sub 22

"Facility" means the combination of all structures, buildings, equipment, control apparatus, storage tanks, source operations, and other operations that are located on a single site or on contiguous or adjacent sites and that are under common control of the same person or persons. Research and development facilities that are located with other facilities shall be considered

separate and independent entities for the purposes of complying with the operating permit requirements of N.J.S.A. 26:2C-1 et seq., or any codes, rules, or regulations adopted pursuant thereto.

"Major facility" means a facility that constitutes a major source, as defined by EPA at 40 CFR 70.2 or any subsequent amendments thereto, and that has the potential to emit any of the air contaminants listed below in an amount that is equal to or exceeds the applicable major facility threshold level. The major facility threshold levels are as follows:

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2/16/2022

From Ocean Wind Doug Gordon:

Viorica –

Orsted and PSEG would like to schedule a meeting with you and your team in regard to the Ocean Wind 01 project. In particular, we are looking to confirm our approach for defining OCS sources that was included in the NOI before submitting the OCS air permit application. We would also like to review other aspects of the OCS permit application and submittal process to support filing a complete application.